



Maine Hospital Association

Representing community hospitals, health care organizations and the patients they serve.

January 7, 2011

Carole Cifrino
Maine DEP
17 State House Station
Augusta, ME 04333-0017

Dear Ms. Cifrino:

Thank you for the opportunity to comment on the Maine Department of Environmental Protection's (DEP) Report: *Implementing Product Stewardship in Maine*. These comments are provided by the Maine Hospital Association (MHA), which represents all 39 of Maine's community hospitals.

The Maine Hospital Association supports the concept of product stewardship as it relates to the disposal of medical sharps from residential sources. We believe it is important to provide a safe way for individuals, who use sharps to manage a wide variety of medical conditions, to dispose of used sharps. Sharps pose a risk of disease transmission when not properly packaged and to solid waste handlers even when packaged according to current state guidelines. The goal is to make it safe for homeowners, sanitation workers, sewage treatment plant operators and waste management personnel at transfer stations, recycling plants and disposal facilities as well as hospitality workers at restaurants, hotels, airports and other locations.

As the report indicates, Maine has an in-state facility for treatment with infrastructure in place to collect waste throughout the entire state. Maine Hospital Association through its wholly owned entity, Associated Health Resources, has a facility in Pittsfield that has the capacity to treat the discarded sharps for proper disposal and has the capability to provide pickup services throughout the state of Maine. We believe this could provide a viable option for the handling and disposal of this waste stream that would minimize the cost to manufacturers of collection, treatment and disposal.

It is critical that the collection sites voluntarily agree to serve in this capacity. MHA would not support a requirement that any location must accept the sharps waste. Some hospitals and other entities currently provide service voluntarily and at their own cost but this involves some risk. We would not be in favor of forcing any facility to become a sharps collection site.

We welcome the opportunity to work with you and the others involved in this initiative as you move forward with the proposal. Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink that reads "Tamara T. Butts".

Tamara T. Butts
Director of Business Development and Administration